

1 ARA JABAGCHOURIAN – Bar No.: 205777
2 **LAW OFFICES OF ARA JABAGCHOURIAN, P.C.**

3 1650 S. Amphlett Boulevard, #216
4 San Mateo, California 94402
5 Telephone: (650) 437-6840
6 Facsimile: (650) 403-0909

7 **MICHAEL J. MANDEL, ESQ. – Bar No.: 42964**

8 **LAW OFFICE OF MICHAEL J. MANDEL**

9 1438 Market Street
10 San Francisco, California 94102
11 Telephone: (415) 626-5400
12 Facsimile: (415) 626-5420

13 Attorneys for Plaintiff
14 HARUE CRAIG

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 (San Jose Division)

18 HARUE CRAIG,

19 Plaintiff,

20 v.

21 COUNTY OF SANTA CLARA, DOUGLAS
22 ULRICH, individually and DOES 1-25

23 Defendants.

No. 17-CV-02115 LHK

**PLAINTIFF’S MOTION TO REMOVE
INCORRECTLY FILED DOCUMENT
AND ORDER**

Date: July 19, 2018

Time: 1:30 p.m.

Ctrm: 8, 4th Floor

Judge: Honorable Lucy H. Koh

ADMINISTRATIVE MOTION TO CONDITIONALLY SEAL DOCUMENTS

PLEASE TAKE NOTICE that Plaintiff Harue Craig seeks a motion to remove an incorrectly filed document. In relation to her opposition to defendants' motion for summary judgment, Plaintiff, through her counsel, Ara Jabagchourian, submitted several exhibits as evidence. Two exhibits were supposed to merely be place holders. One such placeholder was the actual exhibit, a policy and procedure of the Sheriff's Department that Defendants had marked confidential. It was Exhibit K to the declaration and item number 11 of Docket entry number 60. The error was realized once the ecf notice was send to Ara Jabagchourian. Mr. Jabagchourian has immediately contacted the ECF help desk and they have taken down the document temporarily. He has also emailed Judge Koh's clerk regarding the issue and informed the County's attorneys. Mr. Jabagchourian has also corrected the error in an errata declaration.

In order to protect Santa Clara County's confidential designation, Plaintiff request that the motion to remove Exhibit K from the Declaration of Ara Jabagchourian in Support of Opposition to Summary Judgment (Docket No. 60, item #11 (Exhibit K)) be granted.

Respectfully Submitted,

Dated: June 21, 2018

LAW OFFICES OF ARA JABAGCHOURIAN, P.C.

By: /s/
ARA JABAGCHOURIAN
Attorneys for Plaintiff

ORDER

GOOD CAUSE APPEARING, IT IS SO ORDERED. The motion to remove ECF No. 60-11 is GRANTED.

Date: July 2, 2018


HON. LUCY H. KOH, U.S. DISTRICT
JUDGE